



MSPC Advisory Circular

ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF AIR PROGRAMS • MOBILE SOURCE POLLUTION CONTROL PROGRAM

A/C No. 10 May 5, 1972

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Subject: Company Drivers

A. Purpose

The purpose of this Advisory Circular is to establish the procedure whereby manufacturers may exercise an option to use their own drivers to conduct the durability and emission tests at the EPA laboratory in Ann Arbor, Michigan.

B. Background

As emission control standards become more stringent, the significance of small differences in test results increases. EPA is concerned about reaching the highest possible correlation between its laboratory and those of the manufacturers. In order to do this it is necessary to remove as many variables as possible. One of these variables is the difference in results that might stem from the use of company drivers in place of EPA drivers for durability tests.

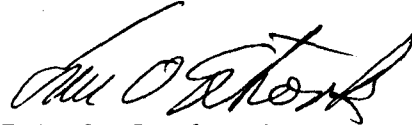
C. Use of Company Drivers

The EPA staff in Ann Arbor and one manufacturer have already conducted an experiment using company drivers for durability tests run on EPA equipment at Ann Arbor. Although results of that experiment indicate little difference in emission results between the test conducted by EPA drivers and company drivers, more experiments with other manufacturers would have to be run before this variable could be termed insignificant.

Therefore, any manufacturer who wishes to participate in an experiment involving the use of his own drivers to conduct the durability and emission tests at the EPA laboratory for the 1974 model year may request to do so. The only condition for approval of such a request would be the signing by the manufacturer and EPA of an agreement that each party would assume the cost of damage to his own property in the case of an accident, unless negligence can be determined on either side. If negligence can be determined, claims can be filed according to normal legal procedures.

For those manufacturers participating in the experiment, consecutive tests will be run at each official test point in the EPA lab, one by the EPA driver and one by the company driver. This will be in addition to the test run at the manufacturer's test facility prior to bringing the vehicle to Ann Arbor for the official test. For the time being, the test conducted at Ann Arbor will be considered the official test. Whether or not EPA drivers or company drivers are used for tests in subsequent years will depend upon a review of the results of the additional experiments.

Participation in the company driver experiment will be arranged and scheduled on a case by case basis, at the initiative of the company through communication with the Division of Certification and Surveillance in Ann Arbor. Participation is encouraged. Since the testing workload at the Ann Arbor lab may on occasion make it impossible for EPA to run the duplicate tests that are required for the experiment, arrangements to participate in the experiment should be made before a vehicle is brought to Ann Arbor for a required EPA test.



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